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Sharon Blechman, Plaintiffs  
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**Hearing Date:** May 12, 2004 at 10:00 a.m.  
**Objection Due:** May 7, 2004 at 4:00 p.m.

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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	:	Chapter 11
IN RE TL ADMINISTRATION	:	
CORPORATION, <u>et al.</u> (f/k/a TWINLAB	:	
CORPORATION, <u>et al.</u> ),	:	
	:	
	:	Case No. 03-15564 (CB)
Debtors.	:	(Jointly Administered)
	:	
	:	
	:	
-----X	:	
BRIAN BLECHMAN, ROBIN	:	
BLECHMAN, DEAN BLECHMAN,	:	
SHARON BLECHMAN, NEIL	:	
BLECHMAN, HELENA BLECHMAN,	:	
STEVE BLECHMAN, ELYSE	:	
BLECHMAN, ROSS BLECHMAN AND	:	
LINDA BLECHMAN	:	
	:	
Plaintiffs,	:	Adversary Proceeding No. 04-02323(CB)
v.	:	(Procedurally Consolidated with
	:	Adversary Proceeding No. 04-02334(CB)
TL ADMINISTRATION CORP. (F/K/A	:	
TWINLAB CORPORATION,	:	
INC.) AND TL ADMINISTRATION, INC.	:	
(f/k/a/ TWIN LABORATORIES,	:	
INC.), THE OFFICIAL COMMITTEE OF	:	
UNSECURED CREDITORS	:	
Defendants.	:	
-----X	:	

**NOTICE OF AND JOINT MOTION OF ROBIN BLECHMAN, SHARON  
BLECHMAN, HELENA BLECHMAN, ELYSE BLECHMAN AND LINDA  
BLECHMAN FOR PARTIAL SUMMARY JUDGMENT UNDER  
FEDERAL RULE OF BANKRUPTCY PROCEDURE 7056**

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law In Support of the Joint Motion of Robin Blechman, Sharon Blechman, Helena Blechman, Elyse Blechman and Linda Blechman For Partial Summary Judgment Under Federal Rule of Bankruptcy Procedure 7056, plaintiffs Robin, Sharon, Helena, Elyse and Linda Blechman (collectively, "Movants") move this Court, pursuant to Rule 7056 of the Federal Rules of Bankruptcy Procedure (incorporating Rule 56 of the Federal Rules of Civil Procedure), for partial summary judgment on the Third Claim for Relief under the "Complaint for Declaratory Judgment under Federal Rules of Bankruptcy Procedure 7001(2) and (9)," dated February 6, 2004, and entry of an order declaring that Movants are subrogated to the rights of The CIT Group/Business Credit, Inc. under Section 509(a) of the Bankruptcy Code and, in that capacity, hold an allowed secured claim in the amount of \$7.5 million (plus interest, costs and expenses) against the Debtors' estates and for further relief as the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that a hearing (the "Hearing") will be held to consider the relief requested in this motion and any further relief before the Honorable Cornelius Blackshear, United States Bankruptcy Judge, in his Courtroom at the United States Bankruptcy Court for the Southern District of New York (the "Court"), Alexander Hamilton Customs House, One Bowling Green, New York, New York 10004, on May 12, 2004, at 10:00 a.m.

PLEASE TAKE FURTHER NOTICE, that objections, if any, to the relief requested in this motion shall be made in writing, shall state with particularity the reasons for the objection, and shall be filed with the Court and served upon (a) Scarcella Rosen & Slome LLP, counsel for Movants, 333 Earle Ovington Boulevard, Ninth Floor, Uniondale, New York 11553, attn: Louis A. Scarcella, Esq.; (b) Schulte Roth & Zabel LLP, counsel for plaintiffs Brian Blechman, Dean Blechman, Neil Blechman, Steve Blechman and Ross Blechman, 919 Third Avenue, New York, New York 10022, attn: James M. Peck, Esq. and David M. Hillman, Esq; (c) Weil Gotshal &

Manges, counsel for the Debtors, 767 Fifth Avenue, New York, New York 10153, attn: Michael Kessler, Esq.; (d) Kaye Scholer LLP, counsel to the Official Committee of Unsecured Creditors, 425 Park Avenue, New York, New York 10022, attn: Richard Smolev, Esq., and Howard Kleinhandler, Esq.; (e) Buchanan Ingersoll PC, counsel to the Official Committee of Ephedra Claimants, 140 Broadway, 35th Floor, New York, NY 10005, attn: Susan Persichilli, Esq.; and (f) Office of the United States Trustee, 33 Whitehall Street, 21st Floor, New York, New York 10004, attn: Mary Elizabeth Tom, Esq., so that they are actually received no later than 4:00 p.m. (Eastern Time) on May 7, 2004. Only those objections which have been timely filed and served may be considered by the Court at the Hearing.

PLEASE TAKE FURTHER NOTICE that if no objections to this motion are timely filed, served and received in accordance with this Notice, the Court may grant the relief requested in this motion without further notice or hearing.

Dated: Uniondale, New York  
April 15, 2004

SCARCELLA ROSEN & SLOME LLP

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